

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

IN RE: Lion Air Flight JT 610 Crash

Lead Case No. 18-cv-07686

This document relates to  
Case Nos. 19-cv-2982, 19-cv-2979, 19-cv-  
2987, 19-cv-2980, 19-cv-5214, 19-cv-5215

Hon. Thomas M. Durkin

**EDELSON PC'S MOTION FOR MODIFICATION OF CONFIDENTIALITY ORDER**

The Court entered a confidentiality order that applies only to the contempt proceedings in this action. (*See* dkt. 1199.) Edelson PC requests that the Order be modified to permit it to share the unredacted exhibits from the contempt hearing with the State Bar of California (the “California Bar”) and any other state bar who similarly agrees to a confidentiality order. In support thereof, Edelson states:

1. The evidentiary portion of the contempt proceedings hearing concluded on December 14, 2022. The proceeding was conducted with unredacted exhibits. The Parties have filed a complete set of those exhibits under seal. (*See* dkts. 1296, 1300, 1319.)
2. The California Bar has requested copies of the exhibits as part of an investigation into David Lira and Keith Griffin.
3. Good cause exists to modify the protective order. *Heraeus Kulzer, GmbH v. Biomet, Inc.*, 881 F.3d 550, 565 (7th Cir. 2018) (setting forth factors for modification of order, under which good cause is the “most significant[.]” factor). To the extent that the California Bar wants to investigate improper conduct by lawyers, it should be permitted to do so. The California Bar should have those exhibits in unredacted form.
4. The signatory to the confidentiality order with a relevant interest in the confidentiality of the protected material is Boeing, in that the exhibits disclose the “top-line”

amounts of the settlements with the former plaintiffs. Boeing does not object to this modification. Mr. Wisner has confirmed that the former plaintiffs have no objection. The California Bar also requested the position of Respondents David Lira and Keith Griffin on June 30, 2022, but it is still not clear whether they object as of the date of this filing. As Mr. Lira and Mr. Griffin have no stake in the confidentiality of this information, Edelson sees no grounds to delay the filing.

5. Accordingly, the Court should modify the Order to permit disclosure to the California Bar and any other state bar (to avoid iterative motion practice on this point if needed).

WHEREFORE, Plaintiff Edelson PC respectfully requests that the Court modify Paragraph 4(b)(8) of the Protective Order For Use In Contempt Proceedings, (dkt. 1199), as set forth in Exhibit A, and enter the supplemental protective order, attached as Exhibit B.

Respectfully submitted,

**EDELSON PC**

Dated: July 15, 2022

/s/ J. Eli Wade-Scott

Jay Edelson  
jedelson@edelson.com  
Alexander G. Tievsky  
atievsky@edelson.com  
J. Eli Wade-Scott  
ewadescott@edelson.com  
Amy B. Hausmann  
abhausmann@edelson.com  
EDELSON PC  
350 North LaSalle Street, 14th Floor  
Chicago, Illinois 60654  
Tel: 312.589.6370  
Fax: 312.589.6378